

27.055 SKF Industries
01115

JOHN ASHCROFT
Governor

G. Tracy Mehan, III
~~EXECUTIVE SECRETARY~~
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office
8460 Watson Road, Suite 217
St. Louis, MO 63119
314-849-1313

March 17, 1989

Mr. C. William McGlocklin
Corporate Environmental Manager
SKF USA Inc.
1100 First Ave.
King of Prussia, PA 19406-1352

L.O.W. #89-SL.021

Dear Mr. McGlocklin:

Enclosed, please find a report of an inspection conducted by Mr. Kerwin Singleton. Please note that the section titled "UNSATISFACTORY FEATURES" list violations noted during the inspection. The "RECOMMENDATIONS" outline the steps the inspector has determined will correct those violations.

In order to document that corrective actions have been taken, you are requested to submit a written response no later than April 20, 1989. The response should describe the steps taken to correct each of the unsatisfactory features identified. Please direct the response to my attention. You should also forward a copy of your response and supporting documentation to Ms. Sandra Carrol, Chief - Hazardous Waste Enforcement, Waste Management Program, P.O. Box 176, Jefferson City, MO 65102.

It is our purpose by this letter to persuade you to take all necessary actions to comply with the Missouri Hazardous Waste Management Law. Failure to achieve timely resolution of violations may result in the referral of this case for enforcement action by the Waste Management Program.

Should you have any questions, or wish to confer in this matter, please contact me.

Sincerely,

ST. LOUIS REGIONAL OFFICE

Mike Struckhoff
Mike Struckhoff
Chief, Hazardous Waste Unit

MS/cj

Enclosure

cc: CO - Waste Management Program



R00025207
RCRA Records Center

HAZARDOUS WASTE COMPLIANCE INSPECTION REPORT

FACILITY

SKF Industries
2520 Marconi Ave.
St. Louis, MO 63110

MO. Gen. I.D. #: 01115
EPA I.D. #: ~~M00990870396~~
MOT 3000 10345

INTRODUCTION

A visual inspection of the former SKF Industries facility (St. Louis City) was conducted on December 13, 1988. A facility representative notified the Department in August 1986 that manufacturing operations at the site had ceased on July 31, 1986.

Although the SKF Foundry in Washington, Missouri was administratively released from interim status as of February 23, 1988, sufficient documentation indicating that the St. Louis Facility never used its interim status is not on file with the Department.

The facility representative to be contacted regarding this investigation is:

Mr. C. William McGlocklin
Corporate Environmental Manager
SKF USA, Inc.
1100 First Ave.
King of Prussia, PA 19406 - 1352

UNSATISFACTORY FEATURES

1. The storage facility was not closed in accordance with 40 CFR 265 Subpart G.
2. The facility has not complied with the financial requirements of 40 CFR 265 Subpart H.

COMMENTS

The name of one of the property owners, Mr. Steve Trampe, Cordage Mill Management Co. (314/421-4730), was obtained from the real estate agent, Mr. Irv Heide, Nooney Krombach (314/863-4888). Cordage Mill Mgmt. owns 60% of the manufacturing space, and permission was given to the inspector to inspect the building.

Cordage Mill leases warehouse space to Shamrock Building Supply, owned by Mr. Tom Walsh (314/532-1589). There was no evidence of Hazardous Waste storage or spillage around the site. A copy of the environmental assessment was requested and subsequently received by the St. Louis Regional Office. A copy of the Environmental Risk Assessment prepared by Risk Science International has also been forwarded to the Waste Management Program - Enforcement Unit.

The hazardous waste storage building shown on a facility map, included in the risk assessment, is no longer in evidence. A new housing development has been constructed immediately east of the main manufacturing complex (see attached map), occupying the area where the storage building and several other plant buildings were situated.

By reviewing information included in the risk assessment and information received from Mr. McGlocklin, it is evident that the St. Louis facility has been unable to conclusively document that it has never used its interim status. The Missouri Department of Natural Resources inspection report of July 12, 1984 does state that the facility had stored an unregistered waste over 90 days. Also, a letter from Mr. Thomas Ganfield, Waste Management Program, dated November 3, 1986, advised the facility to continue to comply with the regulations until it could be verified that the facility had never used its interim status. There is no documentation on file releasing the St. Louis Facility from interim status.


RECOMMENDATIONS

As the hazardous waste storage area was closed without approval, please submit documentation of the closure activities with the most recent copy of the closure plan for the facility. Also, submit documentation that the facility maintained the required financial assurances for closure costs and liability coverage.

Should you have any questions regarding this report, please contact Mr. Kerwin Singleton at this office, or:

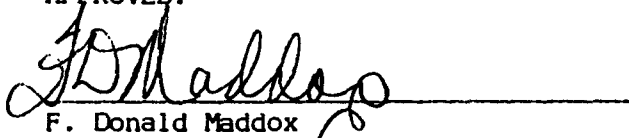
Ms. Sandra Carroll
Chief, Hazardous Waste Enforcement Unit
MDNR - Waste Management Program
P.O. Box 176
Jefferson City, MO 65102
314/751-3176

PREPARED BY:


Kerwin C. Singleton
Environmental Engineer
Hazardous Waste Management Unit

17 Mar 89
Date

APPROVED:


F. Donald Maddox
Regional Administrator
St. Louis Regional Office

8/17/89
Date

FDM/KCS/cj

Enclosure

cc: CO - WMP

HAZAR ; WASTE TREATMENT/STORAGE/DISPO FACILITY
Interim Status Checklist

Form IS-INSP
(10-15-88)

Name of Facility: SLE INDUSTRIES Date: 12/13/88

Off-Site Facility? y Xn I.S. for: STORAGE

Address: 2320 MARCONI AVE Other Inspections Done:
ST LOUIS, MO 63110 RR TRANS LDR
OTHER

Phone: (215) 962-4467 MO ID# 01115 EPA ID# MO D990870396

Facility Representative: BILL MCGLOGLIN Title: CORP. ENVIR. MGR

Briefly describe manufacturing process(es). (Use continuation sheet, if needed.)

FACILITY CEASED PRODUCTION IN JULY 86

List of wastes generated. (Use continuation sheet, if needed.)

	<u>Waste</u>	<u>Amount/Month</u>	<u>Disposition</u>
1.			
2.			
3.			
4.			
5.			

A. MANIFESTS AND RECORDKEEPING 10 CSR 25-5.262(2) AND 5.262(2)(B) AND (D)

Generator's MO and EPA I.D. Numbers. ()
Manifest document number (MO I.D. & Shipment #). ()
EPA Waste I.D. codes ()
Generator's name, address, phone # ()
All Transporters' names, phone #'s, MO and EPA I.D. #'s. ()
Designated facility name, address, phone # and MO and EPA I.D. # ()
Proper DOT Shipping Name, Hazard Class and I.D. # ()
Containers, Quantity and Unit Wt/Vol being shipped properly designated ()
Proper certification including waste minimization. ()
Manifest properly signed and dated ()
No more than 10 days time between generator and facility signatures. ()
Manifests returned within 35 days ()
If not, exception generator report submitted within 45 days. ()
Completed manifests and Summary Manifest Report and Certification. ()
Spills of reportable quantities reported to DNR. ()

B. PRETRANSPORT, CONTAINERIZATION AND LABELING 10 CSR 25-5.262(2) AND 5.262(2)(C)

Waste Packaged, marked and labeled per DOT during entire on-site storage period and prior to transport. ()
Placards available for use by transporters ()
Satellite accumulation requirements met (if applicable). ()
a. Stored in satellite areas less than 1 year. ()
b. Containers marked identifying contents and beginning date ()
c. Containers kept closed/compatible/good condition. ()
d. Quantities accumulated not exceeding 55 gal. (1 qt. acutely hz. waste). ()

C. WASTE ANALYSIS 10 CSR 25-7.265(2) AND 7.264(2)(B)

Waste analysis plan. ()
Identify hazardous wastes handled at facility. ()
Means to confirm wastes received from off-site ()

D. SECURITY 10 CSR 25-7.265(1) AND 7.265(2)(B)

24-hour surveillance system at facility or
An artificial or natural boundary/controlled access. ()
Restricted access sign posted at each entrance ()
Legible from a distance of 25 feet ()

Briefly describe was treams managed at each TSD pro .

<u>Waste</u>	<u>Amount/month</u>	<u>Process</u>	<u>Design Capacity</u>

E GENERAL INSPECTION 10 CSR 25-7.265(2) AND 7.265(2)(B)

Facility inspected and maintained. ()
Inspection log and written schedule for inspecting. ()
Inspect emergency equipment. ()
Inspect security devices. ()
Inspect operating and structural equipment. ()

F PERSONNEL TRAINING 10 CSR 25-7.265(2) AND 7.265(2)(B)

Documentation of hazardous waste director's qualifications or training. ()
Completed classroom or on-the-job training. ()
Job title, description, and name of person filling position. ()
Written record of the type and amount of training given. ()
Documentation confirming that training has been given. ()

G. PREPAREDNESS AND PREVENTION 10 CSR 25-7.265(2) AND 7.265(2)(C)

Internal communication or alarm system. ()
Device in the hazardous waste operation area capable of summoning emergency assistance. ()
Fire control, spill control, and decontamination equipment available. ()
Adequate water supply for fire control equipment. ()
Adequate and proper safety equipment available. ()
Adequate aisle space. ()
Arrangements with local emergency agencies. ()

H. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-7.265(2) AND 7.265(2)(D)

Contingency plan. ()
Detailed description of procedures that personnel must implement in response to fires, explosions, or release of hazardous waste. ()
Describe formal arrangements with emergency agencies. ()
Names, addresses and phone numbers (home & office) of emergency coordinators. ()
Emergency equipment including its description and location. ()
Evacuation plan if applicable. ()

I WASTE OIL 10 CSR 25-11.010

Waste oil properly handled. ()
Written waste oil contract maintained. ()

J. MANIFEST, RECORDS, REPORTING 10 CSR 25-7.265(2) AND 7.265(2)(E)
For off-site facilities

Manifests signed and dated. ()
Copy to transporter. ()
Copy to generator in 30 days. ()
Copy at facility for 3 years. ()

Operating record

Description, quantity, and TSD process for all hazardous wastes. ()
Location and quantity of all hazardous waste. ()
Waste analysis records from off-site sources. ()
Summary and description of emergency incidents. ()
Record of inspections. ()
Monitoring, testing and analytical results if necessary. ()

Reporting

Unmanifested waste reports for off-site facilities. ()
Reports for emergencies, spills, closure. ()

K. INTERIM STATUS CONTAINERS 10 CSR 25-7.265(2) AND 7.265(2)(I)

Containers closed and in good condition. ()
Containers made of materials compatible with hazardous wastes placed in them. ()
Hazardous waste containers storage area inspected once a week. ()
Inspection log. ()
Containers holding ignitable or reactive waste at least 50 ft. from the property line. ()
Incompatible waste placed in different containers. ()
Are storage containers holding hazardous waste which are incompatible with nearby materials separated by dikes, berms, walls, or other devices. ()
Containers stored within a containment system (if applicable) meeting criteria of 10 CSR 25-7.265(2)(I). ()

L. INTERIM STATUS TANKS - 10 CSR 25-7.265(2) AND 7.265(2)(J)
(See Tank Checklist)

M. INTERIM STATUS SURFACE IMPOUNDMENTS 10 CSR 25-7.265(2) AND 7.265(2)(K)

2 ft. of freeboard in surface impoundment. ()
Earthen dikes have protective covers. ()
New additions, replacements, or expansions of existing surface impoundments designated with double liner and leachate system. ()
Waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment. ()
Freeboard level inspected each operating day. ()
Dikes & vegetation inspected weekly for leaks, deterioration or failures. ()
Inspections recorded in inspection logs. ()
Waste treated, rendered or mixed so that mixture no longer meets the definition of ignitable or reactive. ()
Incompatible wastes segregated in separate surface impoundments. ()

N. GROUNDWATER MONITORING 10 CSR 25-7.265(2) AND 7.265(2)(F)
 Applicable to surface impoundments, landfills and landfills
 Groundwater monitoring wells installed N
 Wells are structurally sound A
 Sampling and analysis plan on-site
 Samples and groundwater levels taken
 Groundwater monitoring results kept

O. CLOSURE AND POST-CLOSURE 10 CSR 25-7.265(2) AND 7.265(2)(G)
 Closure plan for facility.
 Description of how and when facility will be closed.
 Estimate of maximum inventory of hazardous waste
 Steps to decontaminate equipment
 Post-closure plan for disposal facilities only N/A

P. FINANCIAL REQUIREMENTS 10 CSR 25-7.265(2) AND 7.265(2)(H)
 Cost estimate for facility closure
 Financial assurance for closure and post-closure
 Liability for sudden accidents
 Liability for non-sudden accidents for disposal only N/A

COMMENTS: Facility closed HW storage area
w/o Dept Approval

Inspector Signature & Title: Kenneth English
 Office: St Louis

IN COMPLIANCE (✓)
 IN VIOLATION OR
 ABSENT (—)

27085

SKF USA Inc.

SKF

King of Prussia, PA
USA

January 26, 1989

State of Missouri
Department of Natural Resources
Division of Environmental Quality
St. Louis Regional Office
St. Louis, Missouri 63119

RECEIVED

JAN 31 1989

SLRO

Attention Kevin Singleton

Gentlemen:

Per our discussion, enclosed are the quarterly reports for 1985 submitted to your department for our St. Louis facility. As you can see, hazardous waste was only generated and shipped in the first quarter. This can be verified by the biennial report also enclosed. This is the best documentation I can provide.

I have also enclosed the correspondence related to our efforts to relinquish our status. Included is a letter from Thomas Ganfield acknowledging our request, as well as a letter I received from N. A. DiPasquale, removing the status from our Washington facility. Since the same request was made for the St. Louis plant, I felt that since this plant was already closed, the status was also rescinded.

If the information submitted does not resolve the issue, please contact me.

Sincerely,



C. William McGlocklin
Corporate Environmental Manager

CWM/kts
Enclosures

(SINGLETON)GC#7

McQUAY-NORRIS

April 15, 1985

RECEIVED
JAN 31 1989

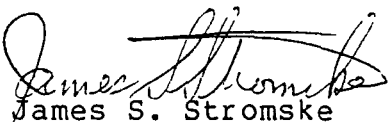
Mr. David Bedan, Director
Waste Management Program
Missouri Department of Natural Resources
P.O. Box 1368
Jefferson City, MO 65102
Subject: Completed Manifests

SLRO

Dear Mr. Bedan:

Attached you will find the completed manifests for the quarter, Jan. 1, 1985 thru March 31, 1985. Should you have any questions please let me know.

Very truly yours,


James S. Stromske
Environmental Specialist
McQuay-Norris

cc: A. Kerns
J. Palovchik
K. Henstrand-KOP

1031E
lp



Please print or type

(Form designed for use on white (12 pitch) typewriter)

EPA Form 8700-22 (3-84)

01115-0017 VOID-007
Form approved EPA-40 2080-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No. MO D 9 9 0 8 7 0 3 9 6 0 0 1 7		Manifest Document No of 1		2 Page 1		Information in the shaded areas is not required by Federal law but is required by Illinois law					
3. Generator's Name and Mailing Address McQUAY-NORRIS 2320 MARCONI ST. LOUIS, MO. 63110						A. Illinois Manifest Document Number IL 1123303							
4. Generator's Phone (314) 776-4800						B. Illinois Generator's ID 9 12 19 11 18 19 10 11 19 19 1							
5. Transporter 1 Company Name SCHIBER TRUCK LINE NOT H-1427						C. Illinois Transporter's ID 10 10 12 15							
6. US EPA ID Number I L D 0 0 6 4 9 3 1 9 1						D. (618) 254-2514 Transporter's Phone							
7. Transporter 2 Company Name						E. Illinois Transporter's ID							
8. US EPA ID Number						F. () Transporter's Phone							
9. Designated Facility Name and Site Address CLAYTON CHEMICAL 1 MOBILE AVE. SAUGET, IL. 62201 MARR-001						G. Illinois Facility's ID 11 16 13 11 12 11 10 14 1 1							
10. US EPA ID Number I L D 0 6 6 9 1 8 3 2 7						H. Facility's Phone (618) 271-0467							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		L Waste No.	
a. HM XX WASTE KEROSENE UN 1223						11 DM		16 10 15		G		EPA HW Number 10 10 11 Authorization Number	
b.												EPA HW Number Authorization Number	
c.												EPA HW Number Authorization Number	
d.												EPA HW Number Authorization Number	
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information IF NOT DELIVERED TO ABOVE TSD, RETURN TO McQUAY-NORRIS						RECEIVED JAN 31 1989							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations.						SLRO							
Printed/Typed Name I PALOVCHIK						Signature [Signature]		Date Month Day Year 01/13/85					
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name [Signature]		Signature [Signature]		Date Month Day Year 01/13/85			
18. Transporter 2 Acknowledgement or Receipt of Materials						Printed/Typed Name		Signature [Signature]		Date Month Day Year			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						Printed/Typed Name Pam Fenster		Signature [Signature]		Date Month Day Year 01/13/85			

JAN 31 1989

EMERGENCY RESPONSE
SUGGESTED
1-800-424-6402
CHEM-TREK
1-800-424-3300

HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on letter (12 pitch) typewriter)

Form Approved OAR 2000 0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No MOD99087039610016		Manifest Document No 10016		2. Page 1 of 1		Information in the shaded areas is not required by Federal law			
3. Generator's Name and Mailing Address McQUAY NORRIS 2320 MARCONI ST LOUIS MO 63110						A. Missouri Manifest Document Number 0-1-1-510-0-1-6					
4. Generator's Phone (314) 776-4800						B. State Generator's ID - other MOD 990870396					
5. Transporter 1 Company Name BOB'S HOME SERVICE			6. US EPA ID Number MOD-06852-1-228			C. Missouri Transporter's ID H1002			D. Transporter's Phone 314-745-3371		
7. Transporter 2 Company Name			8. US EPA ID Number			E. Missouri Transporter's ID			F. Transporter's Phone		
9. Designated Facility Name and Site Address BOB'S HOME SERVICE RT. 1 Box 116F WRIGHT CITY MO. 63390						10. US EPA ID Number MOD-06852-1-228				G. State Facility's ID 727906736122282001	
						H. Facility's Phone 314-745-3371					
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol	
a. CORROSIVE WASTE SOLID UN 1759								9 Drums			
b. WASTE PARCO LUBRIZOL SOLID						9 DM		40.50		P	
c.											
d.											
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above					
15. Special Handling Instructions and Additional Information IF NOT DELIVERED TO TSO FACILITY RETURN TO McQUAY-NORRIS BHS Call 02/01/85-174											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and applicable state regulations.											
Printed/Typed Name JOSEPH M PALOVCHIK						Signature <i>Joseph M Palovchik</i>			Date 01/29/85		
17. Transporter 1 Acknowledgement of Receipt of Materials											
Printed/Typed Name Emory L Wondol						Signature <i>Emory L Wondol</i>			Date 1/29/85		
18. Transporter 2 Acknowledgement or Receipt of Materials											
Printed/Typed Name						Signature			Date		
19. Discrepancy Indication Space											
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19											
Printed/Typed Name Patrick R. van Breusegen						Signature <i>Patrick R. van Breusegen</i>			Date 01/29/85		

MISSOURI DNR FINAL COPY - PART 1

THIS COPY MUST BE TRANSMITTED TO THE DEPARTMENT AFTER ITS RETURN FROM THE DESIGNATED FACILITY.

Please print or type

(Form designed for use on elite

pitch typewriter)

EPA Form 8700-22 (3-84)

115-0015 JPC 62831
Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No 110099087039610015		Manifest Document No. 115-0015		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but is required by Illinois law					
3. Generator's Name and Mailing Address McQUAY-NORRIS 2320 MARCONI ST. LOUIS MO. 63110						A. Illinois Manifest Document Number IL 1123301							
4. Generator's Phone (314) 776-4800						B. Illinois Generator's ID 92911890199							
5. Transporter 1 Company Name SCHIBER TRUCK LINE						C. Illinois Transporter's ID 1010215							
6. US EPA ID Number ELD006493191						D. (618) 254-2514 Transporter's Phone							
7. Transporter 2 Company Name						E. Illinois Transporter's ID							
8. US EPA ID Number						F. () Transporter's Phone							
9. Designated Facility Name and Site Address CLAYTON CHEMICAL 1 MOBILE AVE SAUGET, IL. 62201						G. Illinois Facility's ID 116311211041							
10. US EPA ID Number ELD066918327						H. Facility's Phone (618) 271-0467							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		L. Waste No.	
a. UN2831 ORMA XX WASTE TRICHLOROETHANE III						No. Type 1 TT		1000 G				EPA HW Number 110191 Authorization Number 992935	
b.												EPA HW Number Authorization Number	
c.												EPA HW Number Authorization Number	
d.												EPA HW Number Authorization Number	
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information IF NOT DELIVERED TO ABOVE TSO, RETURN TO McQUAY-NORRIS						RECEIVED JAN 31 1989							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and Illinois regulations.						SLRO							
Printed/Typed Name J. PALOVCHIK						Signature J. Palovchik		Date Month Day Year 01/16/85					
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name D. Young		Signature D. Young		Date Month Day Year 01/16/85			
18. Transporter 2 Acknowledgement or Receipt of Materials						Printed/Typed Name		Signature		Date Month Day Year			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						Printed/Typed Name Tam Fenster		Signature Tam Fenster		Date Month Day Year 01/16/85			

IN ILLINOIS. 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS. 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION. PART - 1 GENERATOR PART - 2 IEPA

PART - 3 FACILITY

PART - 4 TRANSPORTER

PART - 5 IEPA

PART - 6 GENERATOR

REV # 5

GENERATOR COPY - PART 1. DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

This Agency is authorized to require, pursuant to Illinois Revised Statutes 1983, Chapter 111, Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Federal Government Center.

McQUAY-NORRIS

September 17, 1985

RECEIVED
JAN 31 1989

SLRO

Mr. David Bedan, Director
Waste Management Program
Missouri Department of Natural Resources
P.O. Box 1368
Jefferson City, MO 65102

Dear Mr. Bedan:

This letter is to notify you that for the quarter, April 1,
1985 thru June 30, 1985 no waste was shipped from our plant.

Yours truly,



Kim Lerch
Environmental Specialist
McQuay-Norris

cc: A. Kerns
B. McGlocklin (KOP)
J. Palovchik
J. Stromske

3435E
CS

McQUAY-NORRIS

February 20, 1986

RECEIVED
JAN 31 1989

SLRO

Mr. David Bedan, Director
Waste Management Program
Missouri Department of Natural Resources
P.O. Box 1368
Jefferson City, MO 65102

Dear Mr. Bedan:

This letter is to notify you that for the quarter, July 1, 1985 thru September 30, 1985 no waste was shipped from our plant.

Yours truly,



Kim Lerch
Environmental Specialist

cc: A. Kerns
B. McGlocklin (KOP)
J. Palovchik
J. Stromske

6031E
CS

McQUAY-NORRIS

February 20, 1986

RECEIVED

JAN 31 1989

SLRO

Mr. David Bedan, Director
Waste Management Program
Missouri Department of Natural Resources
P.O. Box 1368
Jefferson City, MO 65102

Dear Mr. Bedan:

This letter is to notify you that for the quarter, October 1,
1985 thru December 30, 1985 no waste was shipped from our plant.

Yours truly,



Kim Lerch
Environmental Specialist

cc: A. Kerns
B. McGlicklin (KOP)
J. Palovchik
J. Stromske

6031E
CS

March 6, 1986

RECEIVED
JAN 31 1989

SLRO

Mr. Jim Hull
Environmental Section Chief
Waste Management Program
P.O. Box 176
Jefferson City, MO 65102

Dear Mr. Hull:

Attached is the 1985 Generator Bienial Report. If you have any questions, please contact me.



Kim Lerch
Environmental Specialist

cc: A. Kerns
J. Stromske
B. McGlocklin (KOP)

6308E
cms

Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M O D 9 9 0 8 7 0 3 9 6 1 1
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Clayton Chemical

XI. FACILITY ADDRESS

Sauget, Illinois

RECEIVED

JAN 31 1989

X. FACILITY'S EPA I.D. NO.

F I L D 0 6 6 9 1 8 3 2 7
1 2 3 4 5 6 7 8 9 10 11 12

XII. TRANSPORTATION SERVICES USED

SLRO

Schiber Truck Lines Hartford, Illinois EPA I.D. No. ILD006493191

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount or Waste	E. Unit of Measure
1	Trichloroethylene Waste	1 3	F 0 0 1	1 0 0 0	G
2	Kerosene Waste	0 8	D 0 0 1	6 0 5	G
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Line # 1 Density: 12.1 lbs./gal.

Line # 2 Density: 7.5 lbs./gal.

Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

Date rec'd: _____ Rec'd by: _____

XV. GENERATOR'S EPA I.D. NO.

TAC

G	M	O	D	9	9	0	8	7	0	3	9	6	1	
1	2											13	14	15

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JAN 31 1989

SLRO

XVI. WASTE MINIMIZATION (narrative description)

Tricholorthene Waste:

We have reduced the need for degreasing our product, which inturn results in longer life of the tricholorthene.

Kerosene Waste:

This product was replaced with a biodegradable product.

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G M O D 9 9 0 8 7 0 3 9 6 1 1
1 2 13 14 15

X. FACILITY'S EPA I.D. NO.

F M O D 0 6 8 5 2 1 2 2 8
16 28

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Bob's Home Service

XI. FACILITY ADDRESS

Wright City, Missouri

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JAN 31 1989

XII. TRANSPORTATION SERVICES USED

Bob's Home Service Wright City, Missouri EPA I.D. No. MOD068521228

SLRO

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	32	1 Parko Lubrize Waste	0 2	D 0 0 6 35 38 39 42	4 0 5 0	P
			33 34 43	46 47 50 51	59 60	
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

Date rec'd:

Rec'd by:

XV. GENERATOR'S EPA I.D. NO.

T/A/C

G	M	O	D	9	9	0	8	7	0	3	9	6	1
1	2											13	14 15

XVI. WASTE MINIMIZATION (narrative description)

Parko Lubrize Waste:

We have changed phosphating (parko) chemicals from a maganese phosphate to a zinc phosphate resulting in a reduction in waste material.

RECEIVED

JAN 31 1989

SLRO

tear out here

McQUAY-NORRIS

RECEIVED

JAN 31 1989

SLRO

August 30, 1984

Mr. Robert L. Morby
Chief, Hazardous Materials Branch
United States Environmental Protection Agency
Region VII
324 East 11th St.
Kansas City, MO 64106

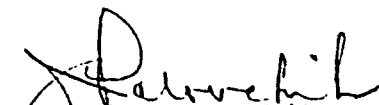
Reference: EPA #MOT300010345.
MO. ID #01115

Dear Mr. Morby:

I would like to request that our facility be reclassified from our present interim "TS&D" status to "Generator" only status.

We have not treated or disposed any hazardous waste at this facility and would see that any hazardous material generated would be disposed of off site within ninety (90) days after accumulation. Please let me know what is required to effect this change.

Your truly,



Joseph Palovchik
McQuay-Norris

JP/lg
6739D

cc: David Bedan Director
Waste Management Program
Missouri Department of Natural Resources
P.O. Box 1368
Jefferson City, MO 65102

D. Hesske
K. Henstrand - K of P

McQUAY-NORRIS

RECEIVED
JAN 31 1989

March 4, 1985

SLRO

Mr. Robert L. Morby
Chief, Hazardous Materials Branch
United States Environmental Protection Agency
Region VII
324 East 11th St.
Kansas City, MO 64106

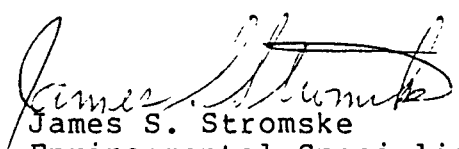
Reference: EPA #MOT300010345
MO. ID #01115

Dear Mr. Morby:

Following up on our request to ^{and} resend our "TS&D" status to
"Generator" only status dated August 30, 1984.

As of this date we have not received notification from your
office that we have been reclassified as a "Generator Only".
We would like to have this matter resolved prior to the Part B
Application filing date in November, 1985. Please let me know
what is required to effect this change.

Very truly yours,


James S. Stromske
Environmental Specialist
McQuay-Norris

cc: David Bedan Director - *Stan Thompson*
Waste Management Program
Missouri Department of Natural Resources
P.O. Box 1368
Jefferson City, MO 65102

A. Kerns
K. Henstrand - K of P ←

lg
0305E

SKF FOUNDRY DIVISION

SKF INDUSTRIAL DIVISION

April 18, 1985

RECEIVED

JAN 31 1989

SLRO

Mr. Robert L. Morby, Chief
Hazardous Materials Branch
United States Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, KS 66101

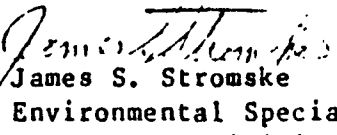
Re: EPA #MODO85909703
MO ID #04142

Dear Mr. Morby:

We would like to request that our facility be reclassified from our present "TS&D" status to "Generator" only status. Our original notification to become a "TS&D" was under protective filing.

We have not treated or disposed of any hazardous waste at this facility and we plan to dispose of any hazardous wastes generated to be shipped off-site within (90) days after accumulation. Please inform us what is required to effect this change.

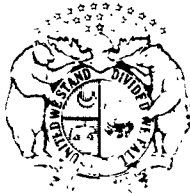
Very truly yours,


James S. Stromske
Environmental Specialist
SKF Foundry Division

cc: David Bedan, Director
Waste Management Program
Missouri Department of Natural Resources
P. O. Box 1368
Jefferson City, MO 65102

F. Hodgson
A. Kincaid
K. Hendstrand-K of P

JOHN ASHCROFT
Governor



FREDERICK A. BRUNNER
Director

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176
Jefferson City, MO 65102

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation
and Historic Preservation

November 3, 1986

RECEIVED

JAN 31 1987

Mr. Bill McGaulkin
SKF Industries
1100 First Avenue
King of Prussia, PA 19406

SLAC

Dear Mr. McGaulkin:

RE: St. Louis # MOD990870396
Washington # MOD085909703

This letter is in response to your claim that SKF Industries does not have to comply with the financial regulations of Subpart H of 10 CSR 25-7.265 and 40 CFR 265 for the St. Louis and Washington facilities because one has been "closed" and the other has terminated its interim status as a TSD facility. Our files do not contain documentation of approved and certified closures, and termination of interim status that would remove the two facilities from the TSD regulatory requirements of 10 CSR 25-7.265 and 40 CFR 265. If you have such letters, please send us a copy of these letters. Otherwise, you will have to request termination as an interim status facility and verify closure.

Since EPA had the authority of terminating interim status, I am also asking them to look for the letters which would absolve you from the TSD regulatory requirements. I will contact you if I receive such letters from EPA.

Until we can verify your claims, SKF Industries must continue to comply with the regulations. As you can see, it is in the best interests of all involved to finalize this issue.

If you have any questions or comments concerning this letter, please feel free to call me at (314) 751-3176.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY

Thomas E. Ganfield
Thomas E. Ganfield
Planner
Waste Management Program

TEG:d1m

cc: Mr. Mike Wolfram, EPA

SKF INDUSTRIES, INC.

RECEIVED

JAN 31 1989

November 11, 1986

SLRO

State of Missouri
Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102
Attn: Thomas E. Ganfield

Dear Mr. Ganfield:

Please find enclosed letters which were sent to EPA (with copies to Mo. DNR) regarding the relinquishment of the interim status for our St. Louis and Washington facilities. Although we have no written response on record from EPA, our people at these locations did obtain verbal approval from EPA on the termination of our interim status. Since there has been no further response from EPA or Mo. DNR as to our status, we have operated only as a generator and have not treated, stored, or disposed of any hazardous waste at either of these locations.

For this reason, we were of the consideration that the financial requirements listed in subpart H, therefore, do not apply. If there were further requirements for relinquishing our interim status, contact should have been made by either EPA or Mo. DNR upon receipt of our notification.

If I can be of any further assistance in finalizing this issue, please do not hesitate to contact me.

Sincerely,

C. W. McGlocklin

C. William McGlocklin
Corporate Environmental Specialist

CWMCG/kw

enclosure

cc: B. Zimmerman

SKF INDUSTRIES NC.

April 21, 1987

State of Missouri
Department of Natural Resources
Division of Environmental Quality
P. O. Box 176
Jefferson City, MO 65102

RECEIVED

JAN 31 1989

Attn: Mr. Rod Breuer - Environmental Engineer

SLRO

RE: RCRA Status - St. Louis # MOT300010345
Washington # MOD085909703

Dear Mr. Breuer:

As per our conversation on 4-16-87, we are hereby requesting an administrative change of our interim status to a "generator only" status. To the best of my knowledge, neither facility has ever treated and/or disposed of any hazardous waste on-site. Also, all hazardous waste has been shipped to an off-site disposal facility within ninety (90) days of accumulation.

We therefore request to relinquish our interim status without a closure plan, since neither facility has ever operated as a TSD facility. Although the Washington facility is still in operation, as I explained, the St. Louis facility has been closed and the property sold. The new owner is not presently using this site as a manufacturing facility.

I appreciate your help in this matter and will await your response. If you have any questions, do not hesitate to contact me.

Sincerely,

Bill McGlocklin

Bill McGlocklin
Corporate Environment
Specialist

BMcG/cwb

cc: A. Kincaid
S. Mansfield
J. Young

SAF INDUSTRIES, INC

April 28, 1987

RECEIVED
JAN 31 1989

Mr. Thomas Ganfield
State of Missouri
Department of Natural Resources
Division of Environmental Quality
P.O. Box 176
Jefferson City, MO 65102

SLRO

Re: Hazardous Waste Financial Assurance - St. Louis #MOT300010345
- Washington #MOD085909703

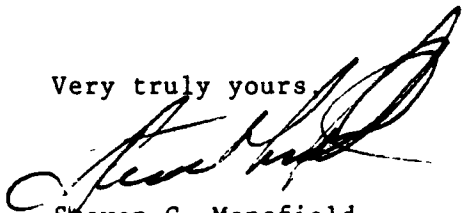
Dear Mr. Ganfield:

Following receipt of your letter of April 9, 1987, and our subsequent telephone conversation, enclosed is a copy of our letter to Mr. Rod Breuer of April 21, 1987.

Following our recent telephone conversation, you were kind enough to transfer us to Mr. Breuer who indicated that there should be no problem to change our status for the above facilities from that of TSD to "Generator Only". Mr. Breuer also indicated that once it has been verified that we do not and have not acted as a TSD, it will not be necessary to provide the State of Missouri with the financial assurance letters required of TSD facilities for closure/post closure care.

Accordingly, I request that you hold your file open on this matter pending receipt of verification by Mr. Breuer that our status has been changed as mentioned above. I understand that this should not take more than two to three weeks. Thank you for your cooperation, and if you have a question do not hesitate to let me know.

Very truly yours,



Steven C. Mansfield
Corporate Risk Manager

SCM:cw(ganfield)misc.#2)

Enclosure

cc: R. A. Zimmerman
B. McGlocklin ✓

WASK INDUSTRIES, INC.

June 8, 1987

Mr. Thomas Ganfield
State of Missouri
Department of Natural Resources
Division of Environmental Quality
P.O. Box 176
Jefferson City, MO 65102

RECEIVED

JAN 31 1989

SLRO

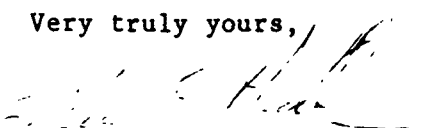
Re: Hazardous Waste Financial Assurance - St. Louis #MOT300010345
- Washington #MOD085909703

Dear Mr. Ganfield:

As of this writing, we have not yet been notified concerning our request for a change in our status to that of "Generator Only" with respect to the captioned locations. As you may recall, Mr. Rod Breuer of your department had indicated that once it was verified that we do not and have not acted as a TSD at either of these locations, our status was to be changed. Accordingly, we have not reissued the financial assurance letters required of TSD facilities for closure/post closure care.

I would very much appreciate it if you would advise us concerning the status of our request for change.

Very truly yours,


Steven C. Mansfield
Corporate Risk Manager

SCM:cw(ganfield)misc.#2)

cc: R. A. Zimmerman
B. McGlocklin ✓

JOHN ASHCROFT
Governor

FREDERICK A. BRUNNER
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176
Jefferson City, MO 65102

file
-TSD
Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation
and Historic Preservation

February 23, 1988

RECEIVED
JAN 31 1989

Mr. Bill McGlocklin
Corporate Environmental Specialist
SKF Industries
1100 First Ave.
King of Prussia, PA 19406-1352

SLK

Dear Mr. McGlocklin:

Re: Washington MOD085909703

This letter is in response to your recent letters concerning the interim status classification for the above referenced facility. Your letters certify that your storage area was never used to store wastes greater than 90 days. As such, the Missouri Department of Natural Resources and the U.S. Environmental Protection Agency are administratively removing the interim status classification for this facility.

You should note, however, that Congress expanded the scope of the federal hazardous waste program with the passage of the Hazardous and Solid Waste Amendments of 1984 (HSWA). If it is ever determined that your interim status was exercised at this facility, SKF Industries, Inc. will be subject to the interim status standards including the HSWA provisions concerning evaluation of solid waste management units and corrective action for releases of hazardous constituents.

If you have any questions, please feel free to call Mr. Dan Tschirgi at (314) 751-3176.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY

Nicholas A. DiPasquale
Nicholas A. Di Pasquale, Director
Waste Management Program

NAD:dt

cc: Mr. Chet McLaughlin, EPA Region VII

bec Art Groner
SLK
Joe Davis